K132822

BD Diagnostics BD MAX™ StaphSR Assay PreMarket Notification

510(k) Summary

November 19, 2013

BD Diagnostics BD MAX™ StaphSR

Submitted by:

GeneOhm Sciences Canada Inc. (BD Diagnostics)

2555 Boul. Parc-Technologique Quebec (Quebec), Canada

G1P 4S5

Contact:

Patricia Dionne, Ph.D.

Device:

NOV 2 6 2013

510(k) Number:

K132822

Trade Name:

BD MAX™ StaphSR

Common Name:

Staphylococcus aureus and Methicillin-resistant

Staphylococcus aureus detection assay

Type of Test:

Staphylococcus aureus and Methicillin-resistant Staphylococcus aureus Qualitative Nucleic Acid Amplification Test from nasal swab specimens

Classification:

Regulation Name:

Antimicrobial susceptibility test powder

Regulation Number:

866,1640

Product Code:

NQX, OOI

Panel:

Microbiology (83)

Predicate Devices:

BD MAX™ MRSA and BD GeneOhm™ StaphSR Assay

Predicate 510(k) Numbers: K120138 and K071026

Intended Use:

The BD MAX™ StaphSR assay performed on the BD MAX™ System is an automated qualitative in vitro diagnostic test for the direct detection and differentiation of Staphylococcus aureus (SA) and methicillin-resistant Staphylococcus aureus (MRSA) DNA from nasal swabs in patients at risk for nasal colonization. The test utilizes realtime polymerase chain reaction (PCR) for the amplification of MRSA/SA DNA and fluorogenic target-specific hybridization probes for the detection of the amplified DNA. The BD MAX™ StaphSR assay is intended to aid in the prevention and control of MRSA and SA infections in healthcare settings. It is not intended to diagnose MRSA or SA infections nor guide or monitor treatment for MRSA/SA infections. A negative result does

not preclude nasal colonization. Concomitant cultures are necessary to recover organisms for epidemiological typing or for further susceptibility testing.

Indication for Use:

The BD MAX™ StaphSR assay performed on the BD MAX™ System is an automated qualitative *in vitro* diagnostic test for the direct detection and differentiation of *Staphylococcus aureus* (SA) and methicillin-resistant *Staphylococcus aureus* (MRSA) DNA from nasal swabs in patients at risk for nasal colonization. The test utilizes real-time polymerase chain reaction (PCR) for the amplification of MRSA/SA DNA and fluorogenic target-specific hybridization probes for the detection of the amplified DNA. The BD MAX™ StaphSR assay is intended to aid in the prevention and control of MRSA and SA infections in healthcare settings. It is not intended to diagnose MRSA or SA infections nor guide or monitor treatment for MRSA/SA infections. A negative result does not preclude nasal colonization. Concomitant cultures are necessary to recover organisms for epidemiological typing or for further susceptibility testing.

Special Conditions for Use Statement: For prescription use

Special Instrument Requirements: The BD MAX™ System

Device Description:

The BD MAX™ System and the BD MAX™ StaphSR assay are comprised of an instrument with associated hardware and accessories, disposable microfluidic cartridges, master mixes, unitized reagent strips, extraction reagents, and sample buffer tubes. The instrument automates sample preparation including target lysis, DNA extraction and concentration, reagent rehydration, and target nucleic acid amplification and detection using real-time PCR. The assay includes a Sample Processing Control (SPC) that is present in the Extraction Tube. The SPC monitors DNA extraction steps, thermal cycling steps, reagent integrity and the presence of inhibitory substances. The BD MAX™ System software automatically interprets test results. A test result may be called as [SA NEG, MRSA NEG (negative)], [SA POS, MRSA POS (MRSA positive)], [SA POS, MRSA NEG (SA positive)] or [SA UNR, MRSA UNR (Unresolved)] based on the amplification status of the target and of the Sample Processing Control. IND (Indeterminate) or INC (Incomplete) results are due to BD MAX™ System failure.

Test Principle:

The BD MAXTM StaphSR assay performed on the BD MAXTM System is an automated *in vitro* diagnostic test for the direct, qualitative detection and differentiation of the *Staphylococcus aureus* (SA) and methicillin-resistant *Staphylococcus aureus* (MRSA) DNA from nasal swabs in patients at risk for nasal colonization.

A nasal specimen is collected and transported to the laboratory using the recommended swab. The swab is placed in a BD MAX™ StaphSR Sample Buffer Tube. The Sample

Buffer Tube is closed with a septum cap and vortexed. A worklist is created and the Sample Buffer Tube, the BD MAX™ StaphSR unitized reagent strip and the BD MAX™ PCR Cartridge are loaded onto the BD MAX™ System.

Following enzymatic cell lysis, the released nucleic acids are captured on magnetic beads. The beads, with the bound nucleic acids, are washed using Wash Buffer and the nucleic acids are eluted by heat in Elution Buffer. Eluted DNA is neutralized using Neutralization Buffer and transferred to a Master Mix to rehydrate PCR reagents. After reconstitution, the BD MAXTM System dispenses a fixed volume of PCR-ready solution containing extracted nucleic acids into the BD MAXTM PCR Cartridge. Microvalves in the BD MAXTM PCR Cartridge are sealed by the system prior to initiating PCR to contain the amplification mixture, thus preventing evaporation and contamination.

The amplified DNA targets are detected using hydrolysis (TagMan®) probes labeled at one end with a fluorescent reporter dye (fluorophore) and at the other end with a quencher moiety. Probes labeled with different fluorophores are used to detect a specific amplicon in the SCCmec right-extremity junction (MREJ), the genes for methicillin resistance mecA and mecC, the nuc gene encoding a thermostable nuclease of S. aureus and SPC amplicons in four different optical channels of the BD MAX™ System: MREJ amplicons are detected in the FAM channel, mecA and mecC amplicons are detected in the ROX channel nuc amplicons are detected in the VIC channel and SPC amplicons are detected in the Cv5.5 channel. When the probes are in their native state, the fluorescence of the fluorophore is quenched due to its proximity to the quencher. However, in the presence of target DNA, the probes hybridize to their complementary sequences and are hydrolyzed by the 5'-3' exonuclease activity of the DNA polymerase as it synthesizes the nascent strand along the DNA template. As a result, the fluorophores are separated from the quencher molecules and fluorescence is emitted. The amount of fluorescence detected in the four optical channels used for the BD MAX™ StaphSR assay is directly proportional to the quantity of the corresponding probe that is hydrolyzed. The BD MAXTM System measures these signals at the end of each amplification cycle, and interprets the data to provide a result.

Substantial Equivalence:

Table 1 shows the similarities and differences between the BD MAX™ StaphSR assay and the predicate devices.

Table 1: Substantial Equivalence Information

	DEVICE		ICATE
ITEM	BD MAX™ StaphSR (K132822)	BD GeneOhm StaphSR Assay (K071026)	BD MAX MRSA Assay (K120138)
Intended Use	The BD MAX™ StaphSR assay performed on the BD MAX™ System is an automated qualitative <i>in vitro</i> diagnostic test for the direct detection and differentiation of <i>Staphylococcus aureus</i> (SA) and methicillinresistant <i>Staphylococcus aureus</i> (MRSA) DNA from nasal swabs in patients at risk for nasal colonization. The test utilizes real-time polymerase chain reaction (PCR) for the amplification of MRSA/SA DNA and fluorogenic target-specific hybridization probes for the detection of the amplified DNA. The BD MAX™ StaphSR assay is intended to aid in the prevention and control of MRSA and SA infections in healthcare settings. It is not intended to diagnose MRSA or SA infections nor guide or monitor treatment for MRSA/SA infections. A negative result does not preclude nasal colonization. Concomitant cultures are necessary to recover organisms for epidemiological typing or for further susceptibility testing.	The BD GeneOhm™ StaphSR Assay is a qualitative in vitro diagnostic test for the rapid detection of Staphylococcus aureus (SA) and methicillinresistant Staphylococcus aureus (MRSA) directly from positive blood culture. The assay utilizes polymerase chain reaction (PCR) for the amplification of specific targets and fluorogenic target-specific hybridization probes for the real-time detection of the amplified DNA. The assay is performed on Gram positive cocci, identified by Gram stain, from positive blood cultures. The BD GeneOhm™ StaphSR Assay is not intended to monitor treatment for MRSA/SA infections. Subculturing of positive blood cultures is necessary for further susceptibility testing.	The BD MAX™ MRSA Assay performed on the BD MAX™ System is an automated qualitative <i>in vitro</i> diagnostic test for the direct detection of Methicillin-resistant Staphylococcus aureus (MRSA) DNA from nasal swabs in patients at risk for nasal colonization. The test utilizes real-time polymerase chain reaction (PCR) for the amplification of MRSA DNA and fluorogenic target-specific hybridization probes for the detection of the amplified DNA. The BD MAX™ MRSA Assay is intended to aid in the prevention and control of MRSA infections in healthcare settings. It is not intended to diagnose, guide or monitor MRSA infections. A negative result does not preclude nasal colonization. Concomitant cultures are necessary to recover organisms for epidemiological typing or for further susceptibility testing.
Specimen type	Nasal swabs	Positive blood culture	Nasal swabs
Assay Format	Amplification: PCR Detection: Fluorogenic target- specific hybridization	Same	Same
Mode of Detection for Methicillin Resistance in S.aureus	Presence of SCC <i>mec</i> cassette at <i>orfX</i> junction and <i>mecA</i> or <i>mecC</i> genes	Presence of SCC <i>mec</i> cassette at <i>orfX</i> junction (specific to <i>S. aureus</i>)	Presence of SCCmec cassette at orfX junction (specific to S. aureus)
Mode of Detection for SA	Presence of <i>nuc</i> gene specific for SA	Same	Not detected
Interpretation of Test Results	Automated (Diagnostic software of BD MAX™ System)	Automated (Diagnostic software of SmartCycler® System)	Automated (Diagnostic software of BD MAX™ System)
Analysis Platform	BD MAX™ System	SmartCycler [®] System	BD MAX™ System
PCR Sample Preparation	Automated by the BD MAX™ System	Manual	Automated by the BD MAX TM System
Detection Probes	TaqMan [®] Probe	Molecular Beacon Probe	TaqMan [®] Probe

	DEVICE	PRE	DICATE
ITEM	BD MAX™ StaphSR (K132822)	BD GeneOhm StaphSR Assay (K071026)	BD MAX MRSA Assay (K120138)
Assay Controls	Specimen Processing Control (SPC)	Positive PCR control (DNA from S.aureus ATCC 43300). Negative control (DNA from S.epidermidis ATCC 14990). Internal Control	Specimen Processing Control (SPC)

Analytical Performance:

Precision

Within-laboratory precision was evaluated for the BD MAX™ StaphSR assay at one (1) site. The Precision panel consisted of 4 sample categories near the LoD. Each specimen contained simulated nasal matrix. MRSA and MSSA strains were tested as follows:

- Moderate Positive (MP) MRSA (MREJ Type ii): ≥ 2 and ≤ 5 x LoD
- Low Positive (LP) MRSA (MREJ Type ii): ≥ 1 and < 2 x LoD
- Low Positive (LP) MRSA (MREJ Type vii): ≥ 1 and < 2 x LoD
- Low Positive (LP) MSSA: ≥ 1 and < 2 x LoD
- High Negative (HN) MRSA (MREJ Type ii): < 1 x LoD
- High Negative (HN) MSSA: < 1 x LoD
- True negative (TN): Negative specimens (no target)

Testing was performed in duplicate, over 12 days, with 2 runs per day, by 2 different technologists. Precision study results for TN, MP, LP, and HN MRSA samples demonstrated 100%, 100%, 97.9%, and 27.1% agreement, respectively. Precision study results for LP and HN MSSA samples demonstrated 100%, and 56.2% agreement, respectively.

Reproducibility

The reproducibility study was performed using the same sample categories as defined above for the Precision Study.

Samples in each category were tested in triplicate, on 5 distinct days, wherein each day 2 panels were tested by 2 different technologists, at 3 clinical sites using 1 lot of reagents (Site-to-Site). One (1) of these clinical sites participated in an extended study where 2 additional lots of reagents were tested (Lot-to-Lot). Results are shown for each sample category with the data from both MRSA strains pooled and MSSA strains.

For Site-to-Site Reproducibility, the overall percent agreement was 100% for MRSA MP and TN categories; 96.7% and 97.8% for MRSA LP and MSSA LP, respectively; and 36.7% and 30.0% for MRSA HN and MSSA HN, respectively (Table 2).

Table 2. Site-To-Site Reproducibility Study Results Using One Lot of the BD MAX™ StaphSR Assay

Catanani	Site	1	Site 2 Site 3		Overall Percent			
Category	Percent Agreement	Count	Percent Agreement	Count	Percent Agreement	Count	<i>P</i>	greement
HN¹ MSSA	16.7%	5/30	23.3%	7/30	50.0%	15/30	30.0%	(21.5%, 40.1%)²
HN MRSA	40.0%	12/30	26.7%	8/30	43.3%	13/30	36.7%	(27.4%, 47.0%)
LP MSSA	96.7%	29/30	100.0%	30/30	96.7%	29/30	97.8%	(92.3%, 99.4%)
LP MRSA	95.0%	57/60	98.3%	59/60	96.7%	58/60	96.7%	(92.9%, 98.5%)
MP MRSA	100.0%	30/30	100.0%	30/30	100.0%	30/30	100.0%	(95.9%, 100.0%)
TN	100.0%	30/30	100.0%	30/30	100.0%	30/30	100.0%	(95.9%, 100.0%)

¹Percent Agreement correlates to the percent of negative results.

For Lot-to-Lot Reproducibility, the overall percent agreement was 100% for MRSA MP and TN; 96.7% for MRSA LP and MSSA LP; 40.0% and 44.4% for MRSA HN and MSSA HN, respectively (Table 3).

Table 3. Lot-To-Lot Reproducibility Study Results using Three Lots of the BD

MAX™ StaphSR Assav

		•						
Cotogony	Lot	1	Lot	2	Lot	3	Overail Percent	
Category	Percent Agreement	Count	Percent Agreement	Count	Percent Agreement	Count		Agreement
HN¹ MSSA	50.0%	15/30	36.7%	11/30	46.7%	14/30	44.4%	(34.6%, 54.7%)²
HN MRSA	43.3%	13/30	43.3%	13/30	33.3%	10/30	40.0%	(30.5%, 50.3%)
LP MSSA	96.7%	29/30	93.3%	28/30	100.0%	30/30	96.7%	(90.7%, 98.9%)
LP MRSA	96.7%	58/60	96.7%	58/60	96.7%	58/60	96.7%	(92.9%, 98.5%)
MP MRSA	100.0%	30/30	100.0%	30/30	100.0%	30/30	100.0%	(95.9%, 100.0%)
TN	100.0%	30/30	100.0%	30/30	100.0%	30/30	100.0%	(95.9%, 100.0%)

¹Percent Agreement correlates to the percent of negative results.

Site-to-Site and Lot-to-Lot Reproducibility performance was acceptable for the LP, MP, and TN sample categories. No specific acceptance criteria was defined for the high negative sample category.

²Confidence Interval

²Confidence Interval

Second Derivative Peak Abscissa (SDPA), an underlying numerical value used to determine a final assay result, was selected as an additional means of assessing assay reproducibility. Overall mean SDPA values with variance components (SD and %CV) are shown in Table 4.

Table 4. Site-to-Site and Lot-to-Lot Reproducibility Study Underlying Numerical SDPA Overall Results

	•		Site-to-Site		Lot-to-Lot		
		HN MRSA	LP MRSA	MP MRSA	HN MRSA	LP MRSA	MP MRSA
MREJ¹ (MREJ	N	33	174	90	35	174	90
types pooled,	Mean	33.5	31.1	30.7	33.4	31.0	30.8
FAM Channel)	SD	0.72	1.05	0.71	0.72	0.94	0.37
	%CV	2.2%	3.4%	2.3%	2.2%	3.0%	1.2%
mecA or mecC2	N	33	174	90	35	174	90
(MREJ types	Mean	35.1	31.8	31.1	35.0	31.7	31.1
pooled, ROX	SD	1.16	1.42	0.78	1.15	1.36	0.54
Channel)	%CV	3.3%	4.5%	2.5%	3.3%	4.3%	1.7%
		HN MREJ Type ii	HN MSSA	LP MSSA	HN MREJ Type ii	HN MSSA	LP MSSA
	N	24	63	88	19	50	87
nuc³	Mean	34.9	34.8	32.0	35.2	34.8	32.0
(VIC Channel)	SD	1.78	1.69	1.12	1.85	1.57	0.78
	%CV	5.1%	4.9%	3.5%	5.2%	4.5%	2.4%
	•	HN MREJ Type ii	HN MSSA	TN	HN MREJ Type ii	HN MSSA	TN
	N	33	27	90	36	40	90
SPC4	Mean	30.0	30.3	30.2	29.9	30.0	30.0
(Cy5.5 Channel)	SD	0.79	0.68	0.63	0.49	0.43	0.45
<u> </u>	%CV	2.6%	2.2%	2.1%	1.7%	1.4%	1.5%

¹Values shown are those obtained for the MREJ target in the samples that gave a SA POS, MRSA POS result

Sample Storage

Specimens can be stored at $25 \pm 2^{\circ}$ C for a maximum of 48 hours or at 2-8 °C for a maximum of 120 hours (5 days) before testing. In case of repeat testing from the Sample Buffer Tube, the following storage conditions apply:

- within 36 hours of the steps covered in the Specimen Preparation section of the package insert, when stored at 25 ±2°C or
- up to 120h (5 days) after the end of the initial run when stored at 2-8°C.

Controls

External Control materials are not provided by BD. Various types of External Controls are recommended to allow the user to select the most appropriate for their laboratory quality control program:

Commercially available control materials [e.g. a reference MRSA strain (ATCC 43300), and Methicillin-susceptible Staphylococcus aureus strain (e.g. ATCC 29213) can be used as positive controls. Staphylococcus epidermidis strain (e.g. ATCC 12228) can be used as negative control.].

²Values shown are those obtained for the mecA or mecC target in the samples that gave a SA POS, MRSA POS result

³Values shown are those obtained for the *nuc* target in the samples that gave a SA POS, MRSA NEG result

⁴Calculated for the Specimen Processing Control of the samples that gave a SA NEG, MRSA NEG result

 Previously characterized specimens known to be positive or negative for S. aureus or MRSA.

The assay includes a Sample Processing Control (SPC) that is present in the Extraction Tube. The SPC monitors DNA extraction steps, thermal cycling steps, reagent integrity and the presence of inhibitory substances.

Analytical Sensitivity

The analytical sensitivity (Limit of Detection or LoD) for the BD MAX™ StaphSR assay was determined as follows: positive specimens were prepared by soaking swabs in a wide range of MRSA or MSSA bacterial suspensions prepared and quantified from cultures. The tested strains included 11 MRSA strains representing 11 MREJ genotypes (i, ii, iii, iv, v, vi, vii, ix, xiii, xiv and xxi) corresponding to 5 SCC*mec* types (I, II, III, IV and XI) as well as 2 MSSA strains. The swabs were then eluted in simulated nasal matrix. Each MRSA and MSSA strain was tested in replicates of 24 per concentration by 2 different operators using 3 different production lots of the BD MAX™ StaphSR assay. Analytical sensitivity (LoD), defined as the lowest concentration at which at least 95% of all replicates tested positive, ranged from 64 to 343 CFU/swab (Table 5) for the detection of MRSA strains and from 174 to 211 CFU/swab (Table 6) for the detection of MSSA strains.

Table 5: Limit of Detection of MRSA Genotypes by the BD MAX™ StaphSR Assay

MRSA Strain	MREJ Genotype	SCCmec type!	LoD Concentration [CFU/swab (95% Cl²)]
1	Type i	ï	84 (49, 142)
2	Type ii	ii	103 (64, 167)
3	Type iii	111	160 (93, 278)
4	Type iv	III _	68 (42, 109)
5	Type v	IV	128 (73, 225)
6	Type vi	ND ³	_343 (186, 632)
7	Type vii	.	219 (110, 439)
8	Type ix	ND ³	144 (82, 255)
9	Type xiii	ND ³	64 (36, 114)
10	Type xiv	ND ³	78 (48, 127)
11	Type xxi⁴	XI	112 (64, 197)

SCCmec type does not correlate to the MREJ type as these are two different typing methods.

Table 6: Limit of Detection of MSSA by the RD MAX™ StanhSR Assav

BB NI OK Claphory Accay				
MSSA Strain	LoD Concentration [CFU/swab (95% Cl ¹)]			
1	174 (89, 341)			
2	211 (105, 428)			

¹Cl: Confidence Intervals

Analytical Inclusivity

An analytical inclusivity study was performed using a variety of MRSA and MSSA strains, taking into account geographic origin, MREJ genotype (wild type and mutant), SCCmec type, Pulsed-Field Gel Electrophoresis (PFGE) type, temporal diversity and susceptibility pattern. Seventy-seven (77) MRSA strains from 27 countries (see Table 7) and 51 MSSA strains from 16 countries were tested in this study, including strains

²CI: Confidence Intervals

³ND = not determined

^{*}mecC-containing MRSA strains (Also known as mecA_{LGA251} strain)

from public collections and from well-characterized clinical isolates, including Vancomycin-Resistant *Staphylococcus aureus* (VRSA) and Vancomycin Intermediate *Staphylococcus aureus* (VISA) strains.

The BD MAX™ StaphSR assay detected MREJ types i, ii, iii, iv, v, vi, vii, ix, xiii, xiv and xxi when tested at low bacterial load (2-3 x LoD). The BD MAX™ StaphSR assay detected MRSA SCCmec types I, II, III, IV, V, VI, VII, VIII and XI as well as MRSA PFGE types USA 100 to 800, 1000 and 1100 at 2-3 x LoD. All MRSA strains displaying additional resistance to vancomycin (VRSA and VISA) were also detected. The BD MAX™ StaphSR assay detected all 51 MSSA strains tested including mecA empty cassette variants.

Table 7: MRSA Strains Tested in the Inclusivity Study of the BD MAXTM StaphSR Assay.

Collection	Reference Number	MREJ Type	SCCmec typing / PFGE type
	ATCC BAA-1770	iii	USA1000
	ATCC BAA-421	ii	VI
	ATCC BAA-38	i	t
****	ATCC BAA-41	ii	11
ATCC	ATCC BAA-39	iii	ill
	ATCC BAA-40	iv	
	ATCC 43300	ii	II
	ATCC 33592	iv	111
Harmony	62305	ii mut36	IV
collection of	97S99	ii mut45	iV
European epidemic	3717	iii	III
MRSA	9805-01937	iii mut45	ND
1.000	ID-61882	iii	III / CMRSA-3
LSPQ	ID-61880	vii	II / CMRSA-1
	NRS383	ii	II / USA200
	NRS385	ij	IV / USA500
	NRS715	ii	II/USA600
	NRS386	ií	IV / USA700
	NRS686	i	IV/IBERIAN
	NRS23 ⁴	ii	II
	VRS5³	ii	ND
	NRS1 ⁴	ii	H
NARSA	NRS4 ⁴	ii	II
	VRS2 ³	ii	ND
	VRS4 ^{1,3}	ii	ND
	NRS382	ii	II / USA100
	NR\$384	ii	IV / USA300
	NRS387	ii	IV / USA800
	NRS484	ii	IV / USA1100
	NRS645	ii	IV/IBERIAN
	NRS123	ii mut36	IV / USA400
NA	NA	ii	II / USA 100
	NA	iii	II / USA 100
	5599	ii	II / USA100

Collection	Reference Number	MREJ Type	SCCmec typing / PFGE type
	7909	ii	IV / USA300
·	7916	ii	IV / USA300
	7917	ii	IV / USA300
	7921	ii	IV / USA300
	7922	ii	IV / USA300
	7913	ii mut36	IV / USA400
	NA	ii	IV / USA 800
	1555 ⁵	xxi	ND
	MAH 30 ⁵	xxi	ND
	CCRI-11840	i	VIII ·
	JCSC6082	iii	VII
	92	xiii	ND
	5109	xiv	ND
	CCRI-12480	ii	ND
	CCRI-12496	ii	ND
	CCRI-12640 ²	ii	ND
	CCRI-9866 ²	ii mut36	ND
	48	iìi	V
	347101	iii	V
	CCRi-12503	iii	ND
	CCRI-12790	. iii	ND
	CCRI-12608	iv	ND
	CCRI-8895	ìv	III
	CCRI-1263	.,	1V
	(R523)	٧	
	CCRI-12767	V .	ND
	571	vi	ND
	MLST 22 HOS 47.3.270206 MJS	vi	ND
	CCRI-12425 ²	vii	ND
	CCRI-12763	vii	ND
	CCRI-9583	vii	JI
	CCRI-9711	vii	ND .
	521	vi	ND
	CCRI-9681	ix	ND
	494	xiii	ND
	ST2011 1100 ⁵	ххi	ND
1	126	xiv .	ND
	CCRI-8894	i	ı
	MAH 20 ⁵	ххі	ND
	MAH 1⁵	xxi	ND
	CCRI-1262	iii	III
	CCRI-2025		IV
	CCRI-9773	vii	11
	CCRI-9624	ii mut36	ND
The initial result	t was negative for M		

¹The initial result was negative for MRSA. Both samples (ATCC BAA-42 and VRS4) were repeated from the SBT and assay results are conforming (SA+, MRSA+).

²These are the results for the repeats as the initial run gave an IND result due to a PCR heater warning.

Evaluation of a Well Characterized Challenge Strain Panel

An additional analytical study was carried out to evaluate the analytical performance of the BD MAX™ StaphSR assay using a well characterized challenge strain panel:

- Seventeen (17) out of 17 MRSA strains with high and low oxacillin minimum inhibitory concentrations (MICs), including PFGE types USA 100 to 800, 1000, PFGE type IV/IBERIAN and mecC variant (mecA-containing S. aureus strain LGA251) tested at a concentration of 2-3 x LoD, exhibited SA POS, MRSA POS results.
- Four (4) out of 4 BORSA strains (Borderline Oxacillin-Resistant S. aureus) tested at ≥10⁶ CFU/swab, exhibited SA POS, MRSA NEG results.
- Five (5) out of 5 MSSA strains tested at ≥10⁶ CFU/swab, exhibited SA POS, MRSA NEG results
- One (1) out of 1 Methicillin-Resistant Staphylococcus epidermidis (MRSE) strains tested at ≥10⁶ CFU/swab, exhibited a negative result (SA NEG, MRSA NEG).

Analytical Specificity

The BD MAX™ StaphSR assay was performed on samples containing high levels of non-target organisms and MSSA strains (Table 8), using the BD MAX™ System, to demonstrate the specificity of the assay for detection of MRSA and SA.

- Fifteen (15) out of 15 empty cassette variant MSSA strains tested at ≥10⁶
 CFU/swab produced SA POS, MRSA NEG results.
- Fifty-seven (57) out of 57 strains of various non-staphylococcal species tested at a concentration of at least ≥10⁶ CFU/mL (except for *Cryptococcus* neoformans which was tested at 3x10⁵ CFU/swab) produced negative results (SA NEG, MRSA NEG).
- Forty-five (45) Coagulase-Negative staphylococcal strains (CoNS) and Coagulase-Positive staphylococcal strains (CoPS) representing 28 species were tested at a concentration of 0.5 McFarland with the BD MAX™ StaphSR assay. Forty-five (45) of the 45 strains tested exhibited negative results (SA NEG, MRSA NEG).
- Fifty (50) out of 50 MSSA strains tested at high concentrations ≥10⁶ CFU/swab), produced SA POS, MRSA NEG results.
- Seventeen (17) viruses representing 12 different viral species were tested at ≥ 10⁵ PFU/mL. All 17 viruses produced negative results (SA NEG, MRSA NEG).

³VRSA strains (http://www.narsa.net/control/member/repositories)

VISA strains (http://www.narsa.net/control/member/repositories)

⁵mecC variant strains

Table 8: Microorganisms Tested for the Analytical Specificity Study

	'Non	Staphylococcal Spe	cies	
Acinetobater baumannii	Corynebacterium bovis	Escherichia coli (3 strains)	Neisseria meningitidis	Pasteurella aerogenes
Acinetobater haemolyticus	Corynebacterium flavescens	Haemophilus influenzae	Streptococcus anginosus	Proteus mirabilis
Bacillus cereus	Corynebacterium genitalium	Klebsiella oxytoca	Streptococcus agalactiae	Proteus vulgaris
Bordetella pertussis	Cryptococcus neoformans	Klebsiella pneumoniae	Streptococcus mitis	Providencia stuart
Candida albicans	Enterobacter	Lactobacillus	Streptococcus	Pseudomonas
(2 strains)	aerogenes	crispatus	mutans	aeruginosa
Candida guilliermondii	Enterobacter cloacae	Lactobacillus reuteri	Streptococcus pneumoniae	Pseudomonas fluorescens
Candida tropicalis	Enterococcus faecalis	Lactobacillus acidophilus	Streptococcus pyogenes	Salmonella enterica subsp. Enterica
Candida glabrata	Enterococcus faecium	Listeria monocytogenes	Streptococcus salivarius	Serratia marcescens
Citrobacter freundii	Enterococcus flavescens	Micrococcus luteus	Streptococcus sanguinis	Shigella sonnei
Citrobacter koseri	Enterococcus hirae	Moraxella catamhalis	Streptococcus suis	Yersinia enterocolitica
Corynebacterium aguaticus	Enterrococcus gallinarum	Neisseria gonorrhoeae	Streptococcus sp.	
Staphylococcus intermedius	Various Coagula Staphylococcus lutrae (2 stains)	se Positive Staphylo Staphylococcus pseudointermedius	Staphylococcus schleiferi	Staphylococcus schleiferi subsp.
Staphylococcus delphini				coagulans
	Various Coagula	se Negative Staphyl	ococcus Species	, '
Staphylococcus arlettae	Staphylococcus chromogenes	Staphylococcus gallinarum	Staphylococcus lentus	Staphylococcus sciuri
Staphylococcus auricularis	Staphylococcus cohnii subsp. urealyticum	Staphylococcus haemolyticus (3 strains)	Staphylococcus lugdunensis	Staphylococcus simulans
Staphylococcus capitis	Staphylococcus epidermidis (9 strains)	Staphylococcus hominis (3 strains)	Staphylococcus pasteuri	Staphylococcus warneri (2 strains
Staphylococcus caprae	Staphylococcus equorum	Staphylococcus hominis subsp. hominis	Staphylococcus pulvereri	Staphylococcus xylosus (2 strains
Staphylococcus carnosus	Staphylococcus felis	Staphylococcus kloosii	Staphylococcus saprophyticus	Staphylococcus xylosus
		Virus		
Adenovirus (type 1 and 7A)	Enterovirus	Human parainfluenza (type 1, 2, 3)	Measles	Respiratory syncytial virus
Human coronavirus (2)	Epstein Barr Virus	Human metapneumovirus	Mumps virus	Rhinovirus
	Human influenza	I		1

Interfering Substances

Twenty nine (29) microorganisms and chemical substances occasionally used in the nares or found in nasal swab specimens were evaluated for potential interference with the BD MAX™ StaphSR assay (Table 9). MRSA negative samples and MRSA positive samples at 2-3 x LoD were tested with the highest amount of each compound or microorganism likely to be found at the sampling site or on the nasal swab sample. Results demonstrated no reportable interference with any microorganisms or chemical substance except for Tobramycin that showed inhibition in the BD MAX™ StaphSR assay when tested at a concentration of 4.5 x 10⁻³ g/swab.

Table 9: Endogenous and Commercial Exogenous Substances Tested with the

BD MAX™ StaphSR Assay

DD WAY Staphon Assay	
Substance Substa	Result
Mucin, from bovine submaxillary glands	NI
Dexamethasone Sodium Phosphate Ophtalmic Solution USP, 0.1% Dexamethasone Phosphate Equivalent	NI
Chloraseptic™	_ NI
Taro-Mupirocin, Mupirocin Ointment USP, 2%	NI
Long Lasting Dristan™ Nasal Mist	NI
Neo-Synephrine™	NI
Equate® Nasal Spray Decongestant	Ni
Beconase AQ™	NI
Flunisolide Nasal Solution USP, 0.025%	NI
Nasacort™ AQ	NI
Nasonex™	NI
Relenza™	NI
Tobramycin	1
Blood	NI
Flumist®	NI ,

Substance	Result
Rhinocort aqua™	Ni
Zicam® No-Drip Liquid™ Nasal	4.11
Gel [™] Extreme Congestion Relief	Ni
Fluticasone Propionate	NI
Luffeel™	NI
Staphylococcus epidermidis	NI
Micrococcus luteus	NI
Enterococcus faecium	NI
Enterococcus faecalis	NI
Escherichia coli	NI
Corynebacterium flavescens	NI
Moraxella catarrhalis	NI
Staphylococcus hominis subsp	NI ,
hominis	•
Haemophilus influenzae	NI
Streptococcus pneumoniae	NI

NI: No reportable interference with the BD MAX™ StaphSR assay.

Microbial Competitive Inhibitory Effect

A study was conducted to determine the potential competitive inhibitory effect of:

- an increasing concentration of MRSE when co-spiked with a low concentration (1-2 x LoD) of MRSA or MSSA, and
- an increasing concentration of MSSA when co-spiked with a low concentration (1-2 x LoD) of MRSA.

Results demonstrated competition from:

- MRSE at an MRSA:MRSE ratio of 1: ≥ 1x10³
- MRSE at an MSSA:MRSE ratio of 1; ≥ 1x10⁵
- MSSA at an MRSA:MSSA ratio of 1; ≥ 1x10⁴.

Carryover / Cross-Contamination

A study was conducted to investigate the potential for carry-over/cross-contamination between high MRSA (≥10⁷ CFU/swab) specimens and negative specimens throughout the BD MAX[™] StaphSR workflow. Twelve (12) replicates of the high

I: Reportable interference with the BD MAX™ StaphSR assay.

positive sample and 12 replicates of the negative sample were tested in each run by alternating negative and positive replicates. Four (4) operators performed a total of 18 runs of 24 samples. Overall, from 203 reportable results out of 216 expected negative samples, 3 false positive results were obtained (3/203; 1.5%) due to carry-over contamination.

Clinical Performance Studies

Clinical performance characteristics of the BD MAX[™] StaphSR assay were determined in a multi-site prospective investigational study. Three (3) investigational centers participated in the study. To be enrolled in the study, patients had to be eligible for MRSA or SA testing according to institutional policies. Eligibility requirements for targeted screening as per clinical site policies included, but were not limited to: patients admitted into the particular healthcare system; patients admitted to the Intensive Care Unit; patients transferred to the Intensive Care Unit; pre-elective surgery patients; and patients being admitted from long-term care facilities. Specimens from patients previously enrolled in the study were excluded.

The Comparative Reference Method consisted of direct culture complemented by enriched culture. Enriched culture analysis was completed for all specimens that were negative for MRSA or SA by direct culture. Presumptive *S. aureus* colonies observed on selective (*S. aureus*) chromogenic medium were subcultured onto Blood Agar (BA). Identification was confirmed with an agglutination test, while methicillin resistance was confirmed by Cefoxitin disk (30 µg) diffusion susceptibility testing. Enrichment in Trypticase Soy Broth with 6.5% NaCI (TSB 6.5% NaCI) was completed in the event that MRSA or SA was not confirmed by the initial direct culture method. Turbid TSB 6.5% NaCI broth was used to inoculate additional chromogenic medium and BA plates; MRSA confirmation was performed as described above.

Results Obtained with the BD MAX™ StaphSR Assay in Comparison to the Reference Method

A total of 2451 specimens were enrolled in the study. Of those, 94 specimens were regarded as noncompliant per protocol criteria and three (3) fully compliant specimens gave final non-reportable PCR results. A total of 2354 specimen results were used to determine the clinical performance of the BD MAXTM StaphSR assay in comparison to the Reference Method (Tables 10 to 13).

Compared to the Reference Method (Direct/Enriched Culture), the BD MAX™ StaphSR assay identified 93.1% of the MRSA positive specimens and 97.5% of the MRSA negative specimens (Table 10). For the population tested, this resulted in a Negative Predictive Value (NPV) of 99.5% and a Positive Predictive Value (PPV) of 73.2%.

Table 10: Results Obtained for MRSA with the BD MAX™ StaphSR Assay in Comparison to the Reference Method

AIDOM	Reference Method			
All'Sites	MRSA	Positive	Negative	Total
	Positive	149	54	203
BD MAX™ StaphSR Assay	Negative	11	2140	2151
	Total	160	2194	2354

Sensitivity: 93.1% (149/160) (95% CI: 88.1%, 96.1%) Specificity: 97.5% (2140/2194) (95% CI:96.8%, 98.1%)

PPV: 73.2% (95% CI: 67.8%, 78.3%) NPV: 99.5% (95% CI: 99.1%, 99.7%)

Further investigation was performed on specimens with discordant results between the Reference Method and the BD MAX™ StaphSR assay.

- 12 of 54 MRSA False Positive BD MAX™ StaphSR specimens were also found to be positive after repeat of Reference Method
- 5 of 11 MRSA False Negative BD MAX™ StaphSR specimens were also found to be negative after repeat of Reference Method

Table 11: Site-by-Site Performance Obtained for MRSA with the BD MAX™ StaphSR Assay in Comparison to the Reference Method

Clinical Sites	☐ Prevalence A Sal	Sensitivity (95% CI)	Specificity (95% CI) D
Ci4- 4	4 30/ /44/000	92.7% (38/41)	98.9% (908/918)
Site 1	4.3% (41/960)	(80.6%, 97.5%)	(98.0%, 99.4%)
C:4- 3	5.8% (38/650)	86.8% (33/38)	98.5% (583/592)
Site 2		(72.7%, 94.2%)	(97.1%, 99.2%)
0:4- 0	10.6% (81/765)	96.3% (78/81)	94.9% (649/684)
Site 3		(89.7%, 98.7%)	(93.0%, 96.3%)
0.70/	6.7% (160/2375°)	93.1% (149/160)	97.5% (2140/2194)
Overali	6.7% (160/23/5)	(88.1%, 96.1%)	(96.8%, 98.1%)

a Prevalence based on reference method only

Compared to the Reference Method (Direct/Enriched Culture), the BD MAX™ StaphSR assay identified 92.0% of the SA positive specimens and 93.1% of the SA negative specimens (Tables 12 and 13). For the population tested, this resulted in a NPV of 96.8% and a PPV of 83.4%.

Table 12: Results Obtained for SA with the BD MAX[™] StaphSR Assay in Comparison to the Reference Method

All Sites		, Reference	Method 🛴	a de la companya de De la companya de la
Amones	SA	Positive	Negative	Total
	Positive	599	118	717
BD MAX™ StaphSR Assay	Negative	52	1585	1637
·	Total	651	1703	2354

Sensitivity: 92.0% (599/651) (95% CI: 89.7%, 93.9%) Specificity: 93.1% (1585/1703) (95% CI: 91.8%, 94.2%)

PPV: 83.4% (95% CI: 81.9%, 85.8%) NPV: 96.8% (95% CI: 96.0%, 97.6%)

Further investigation was performed on specimens with discordant results between the Reference Method and the BD MAX™ StaphSR assay.

- 28 of 118 SA False Positive BD MAX™ StaphSR specimens were also found to be positive after repeat of Reference Method
- 23 of 52 SA False Negative BD MAX™ StaphSR specimens were also found to be negative after repeat of Reference Method

^b Confidence interval

^{°2375} specimens were reference method compliant

Table 13: Site-by-Site Performance Obtained for SA with the BD MAX™ StaphSR

Assay in Comparison to the Reference Method

Clinical Sites	Prevalence *	Sensitivity with 95% CI. Ct.	Specificity with 95% Cl
014- 4	27 29/ /264/0603	90.0% (235/261)	96.3% (672/698)
Site 1	27.2% (261/960)	(85.8%, 93.1%)	(94.6%, 97.4%)
C:4- 2	27.5% (179/650)	91.5% (162/177)	90.9% (412/453)
Site 2		(86.5%, 94.8%)	(88.0%, 93.3%)
014- 0	27.8% (213/765)	94.8% (202/213)	90.8% (501/552)
Site 3		(91.0%, 97.1%)	(88.1%, 92.9%)
	(92.0% (599/561)	93.1% (1585/1703)
Overall	27.5% (653/2375°)	(89.7%, 93.9%)	(91.8%, 94.2%)

^a Prevalence based on reference method only

Results Obtained with the BD MAX™ StaphSR Assay in Comparison to Direct Culture

A total of 2451 specimens were enrolled in the study. Of those, 54 specimens were regarded as noncompliant per protocol criteria and four (4) fully compliant specimens gave non reportable PCR results. A total of 2393 specimen results were used to determine the positive and negative percent agreement of the BD MAX™ StaphSR assay in comparison to Direct Culture (Tables 14 to 17).

Compared to Direct Culture, the BD MAX™ StaphSR assay identified 96.5% of the MRSA positive specimens and 96.9% of the MRSA negative specimens (Tables 14 and 15).

Table 14: Results Obtained for MRSA with the BD MAX™ StanbSR Assay in Comparison to Direct Culture

All Sites		Direct Culture		
		Positive	Negative	Total
	Positive	137	69	206
BD MAX™ StaphSR Assay Negati		5	2182	2187
•	Total	142	2251	2393
Positive Percent Agreeme	nt: 96.5% (1	37/142) (95%	6 CI: 92.0%, 9	98.5%)
Negative Percent Agreemen	nt: 96.9% (21	82/2251) (95	5% CI: 96.1%	97.6%)

Table 15: Site-by-Site Performance Obtained for MRSA with the BD MAX™ StaphSR Assay in

Comparison to Direct Culture

Clinical Sites	Positive Percent Agreement with 95%	Negative Percent Agreement with 95%
Site 1	100% (35/35) (90.1%, 100%)	98.6% (911/924) (97.6%, 99.2%)
Site 2	93.5% (29/31) (79.3%, 98.2%)	97.8% (586/599) (96.3%, 98.7%)
Site 3	96.1% (73/76) (89.0%, 98.6%)	94.1% (685/728) (92.1%, 95.6%)
Overall	96.5% (137/142) (92.0%, 98.5%)	96.9% (2182/2251) (96.1%, 97.6%)

^a Confidence interval

^b Confidence interval

c 2375 specimens were reference method compliant

Compared to Direct Culture, the BD MAX™ StaphSR assay identified 95.1% of the SA positive specimens and 90.9% of the SA negative specimens (Tables 16 and 17).

Table 16: Results Obtained for SA with the BD MAX™ StaphSR Assav in Comparison to Direct Culture

*		gative To	tal
itive 5	0.4		
1410	64 '	164 72	28
ative 2	29 · 1	636 16	65
tal 5	93 1	800 23	93
	tal 5	tal 593 1 .1% (564/593) (95% CI:	

Table 17: Site-by-Site Performance Obtained for SA with the BD MAX[™] StaphSR Assay in Comparison to Direct Culture

Clinical	Positive Percent	Negative Percent
Sites	Agreement with	Agreement with 95%
Site 1	93.0% (213/229) (89.0%, 95.7%)	93.4% (682/730) (91.4%, 95.0%)
Site 2	94.9% (149/157)	88.6% (419/473)
	(90.3%, 97.4%) 97.6% (202/207)	(85.4%, 91.1%) 89.6% (535/597)
Site 3	(94.5%, 99.0%)	(86.9, 91.8%)
Overall	95.1% (564/593) (93.1%, 96.6%)	90.9% (1636/1800) (89.5%, 92.1%)

^a Confidence interval

Out of 2399 nasal swab specimens tested with the BD MAX™ StaphSR assay that were compliant at the specimen and PCR level, 15 (0.6%) were reported as Unresolved after initial testing. The Unresolved Rate after repeat testing is 0.04% (1/2399) (Table 18).

Table 18: Unresolved Rates

Initial Unresolved Rates	Unresolved Rates After Repeat
0.6% (15/2399)* (95% CI: 0.4%, 1.0%)	0.04% (1/2399) (95% CI: 0%, 0.2%)

^{*}Total number based on compliant specimens and BD MAX™ StaphSR assay results

Out of the same 2399 nasal swab specimens tested with the BD MAX™ StaphSR assay, 14 (0.6%) were initially reported as Indeterminate. No result remained Indeterminate upon repeat (two specimens were not retested). Eight (8) (0.3%) were initially reported as Incomplete. No result remained Incomplete upon repeat (one specimen was not retested).

Empty Cassette Variants

Among the 2354 eligible specimens included in the clinical performance determination, a total of 10 specimens fit the empty cassette profile resulting in detection of MREJ, without *mecA* or *mecC* gene detection. All of the 10 specimens were verified true negative MRSA and true positive SA relative to the Reference Method.

Expected Values

In the BD MAX™ StaphSR assay clinical study a total of 2395 reportable results, from specimens compliant at the specimen and PCR levels, were obtained from 3 geographically diverse sites and compared with Direct and Enriched culture. The study population was grouped into in-patient, out-patient and unknown categories. The number and percentage of positive cases, as determined by the BD MAX™ StaphSR assay, are presented in the table below:

7 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -		BD MAXTM S	taphSR Assay.	Positive	*
Group	Total Number of Specimens ¹	Number of . MRSA Positive	Number of SA Positive	MRSA Percentage	Positive SA Percentage
In-patient	1685	178	548	10.6% (178/1685)	32.5% (548/1685)
Out-patient	710	28	182	3.9% (28/710)	25.6% (182/710)
Total ¹	2395	206	730	8.6% (206/2395)	30.5% (730/2395)

¹Total specimens based on compliant PCR results.



Food and Drug Administration 10903 New Hampshire Avenue Document Control Center – WO66-G609 Silver Spring, MD 20993-0002

GENEOHM SCIENCE CANADA, INC. (BD DIAGNOSTICS)
PATRICIA DIONNE, PH.D, MBA
DIRECTOR, REGULATORY AFFAIRS
2555 BOUL. DU PARC-TECHNOLOGIQUE
QUEBEC, QUEBEC, G1P 4S5
CANADA

November 26, 2013

Re: K132822

Trade/Device Name: BD MAX[™] StaphSR Regulation Number: 21 CFR 866.1640

Regulation Name: Antimicrobial Susceptibility Test Powder

Regulatory Class: II Product Code: NQX, OOI Dated: September 16, 2013 Received: September 17, 2013

Dear Dr. Dionne:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Parts 801 and 809); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

If you desire specific advice for your device on our labeling regulations (21 CFR Parts 801 and 809), please contact the Division of Small Manufacturers. International and Consumer Assistance at its toll-free number (800) 638 2041 or (301) 796-7100 or at its Internet address http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to

http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers. International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm.

Sincerely yours,

Sally A. Hojvat -S

Sally A. Hojvat, M.Sc., Ph.D.
Director
Division of Microbiology Devices
Office of In Vitro Diagnostics and Radiological
Health
Center for Devices and Radiological Health

Enclosure

DEPARTMENT OF HEALTH AND HUMAN SERVICES Food and Drug Administration

Indications for Use

Form Approved: OMB No. 0910-0120 Expiration Date: December 31, 2013 See PRA Statement on last page.

510(k) Number (if known) K 132822	
Device Name BD MAXTM StaphSR	
Indications for Use (Describe)	
The BD MAX TM StaphSR assay performed on the BD MAX TM Systedirect detection and differentiation of Staphylococcus aureus (SA) as from nasal swabs in patients at risk for nasal colonization. The test us amplification of MRSA/SA DNA and fluorogenic target-specific hylomogenic hylomogenic target-specific hylomogenic target-specific hylomogenic target-specific hylomogenic target-specific hylomogenic hylo	nd methicillin-resistant Staphylococcus aureus (MRSA) DNA tilizes real-time polymerase chain reaction (PCR) for the bridization probes for the detection of the amplified DNA. The control of MRSA and SA infections in healthcare settings. It is not reatment for MRSA/SA infections. A negative result does not
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•	
Type of Use (Select one or both, as applicable)	ET a Till Constant line (04 CER 207 Subpart C)
☑ Prescription Use (Part 21 CFR 801 Subpart D)	Over-The-Counter Use (21 CFR 807 Subpart C)
PLEASE DO NOT WRITE BELOW THIS LINE - C	ONTINUE ON A SEPARATE PAGE IF NEEDED.
FOR FDA U	
Concurrence of Center for Devices and Radiological Health (CDRH)	(Signature)
Ribhi Shawar -S 2013.11.25 08:19:23 -05'00'	